



March 20, 2008

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Ms. Marie Miller, Chief
Security and Industrial Branch
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

– SENT BY FEDERAL EXPRESS –

Re: Reply to Notice of Violation
Docket No. 03028799 / 2007001
License No. 29-19765-02

Dear Ms. Miller:

URS has reviewed the above-referenced Notice of Violation of U.S. Nuclear Regulatory Commission (NRC) requirements and, in accordance with the requirements of the notice, offers the following information for your review in this matter:

Violation A: URS has conducted a self audit of its radiation protection program content and implementation using NRC's Portable Gauge Audit Checklist (i.e., Appendix F of NRC Document NUREG-1556, Consolidated Guidance About Material Licenses). Through this audit, we have identified several needs for improvement; these needs are primarily associated with documentation requirements of Section 1 (Audit History) and Section 8 (Operating and Emergency Procedures), and annual leak testing of our portable Troxler Model 3411 Nuclear Density Gauges (gauges). As explained to Ms. Orysia Masnyk Bailey of the NRC at the time of her visit to our Totowa, New Jersey Laboratory, the NRC-required records were being reviewed at our Wayne, New Jersey Facility (approximately 3 miles from the Totowa, New Jersey Laboratory where the gauges are stored). While the records were present in Wayne, an office-wide renovation of our work space necessitated movement of the files to other floors in the building to accommodate construction. To date, despite repeated attempts to locate them, we have been unable to find these records.

As discussed with Ms. Baily during her site visit, we do not contest that the required audits have not been performed annually; we believe that the CY 2005 and 2006 audits were not performed. Consequently, as a result of not being able to locate our records, we are unable to produce documentation of prior audits.

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Regarding leak testing, all units in our possession have been leak tested by URS; additional information about this matter is provided in the response to Violation B.

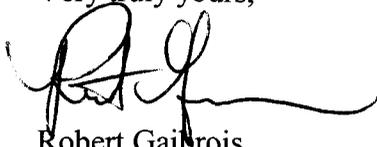
URS is working diligently to address the violations identified by the NRC and those identified during our self audit. While we may never locate the missing records (during the renovation, thousands of archiving boxes were packed and a sizeable amount of files either archived off-site or disposed), we have instituted procedures to recreate our documentation records and to store them in a more securable location. To that effect, audits using the NRC Audit Form will be conducted every two weeks until all identified deficiencies are corrected and at six month intervals thereafter. Unless the missing records are located, we will be unable to comply with historical recordkeeping requirements; with this exception, we expect to meet all program requirements within one month of this letter.

Violation B: As indicated in the response to Violation A, URS cannot produce documentation of annual leak testing of its gauges at this time. However, we do not contest that testing has not recently been performed annually. All gauges owned by URS have been leak tested by URS using Troxler Model 3880 Leak Test Kits with the analysis performed by Troxler Electronic Laboratories, Inc. of Research Triangle Park, North Carolina. URS will leak test all nuclear density gauges it owns at a minimum annual frequency.

Violation C: URS has initiated a documentation procedure for the required physical inventory of the gauges. The meters have always been stored in locked manufacturer-supplied storage containers with the source rods locked with the source within the body of the gauge. All gauges are secured by a heavy chain locked to a fixed retainage in a locked room. Only two individuals have keys to the room and locks. In addition, the building in which the units are stored is locked when URS personnel are not working in the building. All gauges removed from this storage have a Bill of Lading prepared which documents to whom the gauge has been consigned. While performing the self audit, URS confirmed the serial numbers of the gauges and their physical condition with our inventory and did not identify any discrepancies. If any gauge was missing, it would be rapidly identified as none of URS' potential users of these units have the ability to remove the gauges from storage. In order to comply with the NRC requirement to conduct a physical inventory every six months, URS has established a schedule to inspect the units within that time period. This inspection will consist of opening the storage container for each unit, verifying the serial number of the gauge, inspecting the general condition of the gauge, documenting the physical inventory of the gauges, and relocking all security devices.

If you have any questions regarding this letter or require any additional information, please do not hesitate to contact me directly at (973) 812-6836. URS understands its obligation related to radiation safety and compliance with NRC regulations and our license conditions, and is taking the necessary actions to ensure that a reoccurrence of these violations does not occur in the future. We appreciate the assistance of Ms. Bailey in working with us to resolve these matters. Please note that as per our telephone conversation with Ms. Bailey on Tuesday, March 18, this letter has been sent to you rather than to the NRC office in Washington, DC.

Very truly yours,



Robert GaiBrois
Health and Safety Manager

cc: Ms. Orysia Masnyk Bailey, NRC
(by e-mail on March 20, 2008)